

**New York University  
College of Dentistry Policies**

**Title:** Social Media Policy and Protocol\*  
**Effective Date:** September 6, 2017  
**Issuing Authority:** Executive Management Council  
**Responsible Officer:** Office of Communications & Public Affairs

**Background**

New York University College of Dentistry (NYU Dentistry) recognizes that social media websites can be useful communications tools and that they provide an inexpensive, informal, and timely way to participate in an exchange of ideas and information. However, information posted to a website is available to the public; text and images posted online, in the public domain, can never be fully redacted. Accordingly, whenever a student or employee of NYU Dentistry posts to an NYU Dentistry-affiliated social media account, it is imperative that the images and content not violate NYU Dentistry social media policy.

This document seeks to clarify and guide the usage of a tremendously powerful and dynamic communications vehicle that is still in its infancy and is changing as rapidly as the technologies that support it are evolving. Accordingly, it is a work in progress.

**Purpose**

The purpose of this policy is to define the appropriate online activity related to social media and Internet sites when the individual is affiliated with NYU Dentistry.

**Policy**

Information about the Social Media Guidelines of New York University as a whole is available at: <https://www.nyu.edu/life/campus-resources/social-media-at-nyu.html>. However, as a healthcare institution within the University, NYU Dentistry requires a social media policy tailored to ensure that we protect the privacy of our patients, our students, and one another.

NYU Dentistry's social media policy, at its core, requires that *on all NYU Dentistry-focused social media accounts, e.g., those accounts on behalf of NYU Dentistry departments, programs, offices, and student groups,<sup>1</sup> the account administrator must maintain **professionalism** and must protect the privacy of our patients, our students, and one another.*

The policy statements below are divided into two sections:

1. Regarding NYU Dentistry-affiliated accounts
2. Regarding personal accounts where an individual identifies him- or herself as a member of the NYU Dentistry community.

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<sup>1</sup> Student-administered NYU Dentistry pages and groups include student council, class councils, clubs and organizations, and classes, e.g., Class of 2020, etc.

### **Policy Regarding NYU Dentistry-affiliated Social Media Accounts**

Departments, programs, offices, and student groups within NYU College of Dentistry are permitted to create and maintain social media accounts for their specific cohort groups, provided the following measures are taken:

- The social media account must clearly identify the department, program, office, or student group as a component of NYU College of Dentistry. It is permissible to use “NYU Dentistry” but not “NYUCD” as an abbreviation.
- For each College-administered social media account created, the chair of the department or the director of the program or office must assign a minimum of two people to serve as social media account administrators, one of whom must be a member of the staff of the Office of Communications & Public Affairs.
- For each student-administered social media account, two student administrators must be registered with the Office of Student Affairs and Academic Support Services each year.
- Unless specifically authorized by the Office of Communications & Public Affairs, no student or employee is permitted to post on behalf of NYU College of Dentistry as a whole, and the College shall not be liable for same.
- All social media account profiles and posts must be professional, e.g., promoting the work and environment of programs/departments/offices/student groups at the College in a positive way, and must adhere to the **Tone, Voice, and Operational Protocol** set forth below.

### **NYU Dentistry-affiliated Social Media Accounts: Tone, Voice, and Operational Protocol**

- All posts on any department-, program-, or office-affiliated social media accounts, as well as student groups, clubs, organizations, student and class councils and classes, e.g., 2018, 2019, 2020, using NYU-affiliated social media accounts:
  - should relate to dentistry/dental education, research, patient care, and our academic community;
  - should project a positive voice; and
  - should avoid criticism, sarcasm, anger, and any language and/or imagery that is offensive.
- Account administrators are encouraged to use their department/program/office posts to foster a sense of positive community spirit and/or promote the health of the public. Because of the informal nature of social media, users sometimes resort to casual expressions/slang that aim to entertain, but may be unprofessional. Therefore, it’s best to avoid such expressions.
- As a professional school, we should avoid posts that include hyperbole, multiple exclamation marks, and irrelevant “bandwagon” posts, e.g., posts that use a trending hashtag unrelated to dentistry, research, public health, etc.
- Account administrators should feel free to follow and share content from relevant social media accounts of peer institutions, professional thought leaders, other industry/profession leaders, and NYU- and NYU-Dentistry affiliated groups. Account administrators should avoid playing the “sham follower” game, i.e., following unrelated accounts in order to boost your own account’s number of followers/post likes.
- Account administrators who receive complaints or aggressive online behavior on an NYU Dentistry-affiliated social media account should neither respond to nor delete negative comments. They should send an email to the Office of Communications & Public Affairs, which

will respond to the complainant and ask that person to send an email to [dental.web@nyu.edu](mailto:dental.web@nyu.edu), so that the proper resolution can occur.

### **Personal Social Media Accounts: Things to Consider**

Students and employees may maintain personal websites or blogs on their own time, using their own computers.

**Students and employees are prohibited from using the official NYU Dentistry logo or creating any logo which would be recognized as belonging to NYU.**

**Students and employees are prohibited from taking photos in any clinical area with cameras other than those owned by NYU Dentistry, including cell phones, smart phones, etc.**

**Students and employees are prohibited from revealing any information confidential or proprietary to the College, including, but not limited to, employee, student, and patient information.** This includes, but is not limited to, posting any patient information: name, photograph, video, social security number, address, diagnosis, treatment, date of admission, or any other identifying information which may be protected by HIPAA, the Family Education Rights and Privacy Act (FERPA), and any other federal, state, or local privacy regulation, as well as research data, findings, or studies.

Students and employees must keep in mind that if they post information on a social media site that is in violation of NYU Dentistry's policies, they may be subject to disciplinary action.

Students and employees may not post statements that are discriminatory, retaliatory, threatening, or harassing to other students, employees, or patients.

Students or employees who are contacted by a member of the news media or a blog site about an Internet posting that concerns the operations of NYU Dentistry are not permitted to speak on behalf of the College and are required to refer that person to the Office of Communications & Public Affairs.

### **Personal Social Media Professionalism & Confidentiality: FAQs**

#### **What does it mean to be professional in my posting?**

It means presenting yourself or the image of yourself as a professional/competent NYU Dentistry student, faculty, or staff member. Social media sites are public sites. Ask yourself, "Would I want my fellow students, patients, teachers, or staff members, family, future employers, etc., to see this post?" Keep in mind that digital "footprints" are extremely difficult to erase; even though a post may be deleted, one can never be sure whether someone took a screenshot, etc.

Being professional means being respectful to fellow students and employees, and striving for accuracy in your postings. NYU Dentistry students or employees should avoid anger, sarcasm, criticism, insults, and any language that may be defamatory, e.g., causing damage to the good reputation of someone; slander or libel.

#### **What do you mean by protecting patients' and one another's privacy?**

You must not discuss or share any information that is confidential or proprietary. In addition to protected health information (PHI), this may include information about contracts, financial, or clinical data, regulatory issues, Human Resources issues, yourself, or research. You also have a responsibility to respect and protect the privacy of your coworkers and students and shouldn't discuss any private information about your coworkers or students.

**May we post photos/videos of patients on our personal social media page if the patient or patient's guardian has agreed?**

No. You must not post any photos/videos of patients even if the patient or the patient's guardian has agreed. Photos/videos of patients may be taken at the College, with the patient or the patient's guardian's written permission, only by a photographer assigned by the Office of Communications & Public Affairs for the express purpose of being used in official NYU Dentistry promotional materials, or, for clinical purposes, using College-owned and operated cameras.

**May we take a patient's photo/video and send it to them if they ask us to do so?**

No. Cell phone camera use is prohibited in all patient areas.

**May we take a patient's photo/video with the patient's smartphone/camera, if asked to do so?**

No. Cell phone camera use is prohibited in all patient areas.

**May we post an image of a patient's body part or an image when the patient cannot be identified on our personal social media page or on any app?**

No. You must not post any photos/videos of patients, patient's body parts, etc., even if they are de-identified. This includes cell phone photos/videos of body parts as well as images such as X-rays, CT scans, etc.

**May we post photos/videos of research, e.g., human subjects, research laboratories, or research animals?**

No. You must not post images/videos or any information about NYU Dentistry research activities or subjects.

**May we discuss patients on our personal social media pages if we don't identify the patient and don't use the patient's name?**

No. You must not discuss NYU Dentistry patients on your personal social media pages even if the patients are not identified.

**Can we say on our personal social media page that we had a tough day at work?**

Yes, but you should be discrete. You should think about how you may be representing yourself as an NYU Dentistry student or employee with your postings.

**Can I blog about my job and what is going on in my unit if I de-identify all patients?**

You must not share PHI and details of your job. If you are interested in developing an NYU Dentistry – sponsored social media site, contact the Office of Communications & Public Affairs at 212.998.9294. If you have questions about de-identifying, contact the NYU Dentistry Compliance Office at 212.998.9949.

**What if a patient takes a photo/video of me in my unit, posts it on her site, and tags me so that it shows up on my social media page?**

You must un-tag yourself from the photo/video, which will prevent the photo from showing up on your page in the future. Patients are permitted to take photos and post to their site as they are not covered entities under the HIPAA Privacy Rule and are not legally held to the same privacy standards as we are. However, you can have these conversations with patients and talk to your manager about the department's policy regarding photos and cameras. It is a good idea to periodically review your privacy settings on each of your social media accounts.

**I am concerned about patients taking so many photos/videos of our staff and other patients in our unit. Can we ask patients to stop taking and posting photos/videos?**

Yes. Cell phone camera use is prohibited in all clinical areas. Please advise patients/visitors to respect the College's need to maintain patient privacy and security. Please direct any inquiries to the HIPAA Privacy or HIPAA Security Officers.

**Can I post a photo/video of a patient after the patient has left my unit and is no longer a patient?**

No. Once the patient is a patient, he or she is always a patient even when no longer in your unit. He or she is still an NYU Dentistry patient.

*Violations of NYU Dentistry's Social Media Policy and Protocol may result in disciplinary action up to and including termination. In addition, violators may be held personally responsible for costs associated with any breach of this policy and may be subject to a full range of ramifications related to ethics violations.*

**Related Policies**

**Policy on Responsibilities Regarding Information Privacy, Security, and Confidentiality**, at <https://dental.nyu.edu/content/dam/nyudental/documents/intra/policies/information-privacy-responsibilities-policy.pdf>,

**Breach of Patient Information Policy** at <https://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/it-security-info-breach-notification.html> at <http://dental.nyu.edu/student-life/prb.html>

**ADA Principles of Ethics and Code of Professional Conduct** at <http://www.ada.org/en/about-the-ada/principles-of-ethics-code-of-professional-conduct>

**NYU Dentistry Code of Ethics and Professional Conduct** at <http://dental.nyu.edu/content/dam/nyudental/documents/PRB.pdf>

**NYU's HIPAA Security Policies:**  
<https://www.nyu.edu/content/dam/nyu/compliance/documents/IT.HIPAA13.WorkstationSec.v10.122304.020211.061413.072213.081413.022616.100316.pdf>

**Patient Image Use Policy:**  
<https://dental.nyu.edu/content/dam/nyudental/documents/intra/policies/Patient Image Use Policy.pdf>

\*Modified from the NYU Langone Medical Center and Duke University School of Medicine social media policies.

For questions, please contact the Office of Communications & Public Affairs at 212.998.9910.